



November 8, 2017

Thomas J. Navin

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG  
Docket No. 17-59

Dear Ms. Dortch:

On November 6, 2017, Rich Fruchterman, James Garvert, and Scott Deutchman, of Neustar, Inc. (“Neustar”), and the undersigned of Wiley Rein LLP met with Claude Aiken of Commissioner Clyburn’s office. On the same day, Rich Fruchterman, James Garvert, and Aaron Goldberger of Neustar, and the undersigned met with Nirali Patel of Commissioner Carr’s office, and Travis Litman of Commissioner Rosenworcel’s office. On November 7, 2017, James Garvert, Aaron Goldberger, and the undersigned met with Zenji Nakazawa of Chairman Pai’s office and Amy Bender of Commissioner O’Rielly’s office. The purpose of these meetings was to discuss the Commission’s proposed *Report and Order* in the above-captioned proceeding.<sup>1</sup>

The proposed *Report and Order* is an opportunity to take an additional step to further combat unlawful robocalls.<sup>2</sup> Specifically, beyond the permissive blocking of calls described in the *Report and Order*, the Commission should encourage industry to use commercially-available products to provide more information to consumers about incoming calls.

Within the categories of numbers for which the proposed *Report and Order* would permit blocking, the Commission notes the difficulties of sharing information broadly in the industry with respect to DNO and allocated but unassigned numbers.<sup>3</sup>

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Proposed Report and Order, FCC-CIRC1711-01 (Oct. 26, 2017).

<sup>2</sup> Neustar supports the Commission’s conclusion that carriers should be permitted to block calls appearing to come from telephone numbers that are invalid, unallocated, allocated but unassigned or subscriber indicated Do-Not-Originate (DNO). *See generally* Comments of Neustar, Inc., CG Docket No. 17-59 (filed July 3, 2017).

<sup>3</sup> *See Proposed Report and Order* at ¶¶ 16, 36.

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This means terminating carriers often will not know about the DNO or unassigned status of a number on an incoming call unless they deploy commercially available services that can assist with this information. These carriers should be encouraged to use existing Caller Name mechanisms to provide better information about the call to the receiving consumer.

In its comments, Neustar showed how subscribers are in the best position to determine if a call should be answered when given the right tools. By empowering consumers, the Commission can avoid forcing providers to make often highly-subjective determinations about whether a call is illegal. But empowering consumers requires providing them with meaningful information about incoming calls to make an informed decision. Products that make this information available are already on the market and can be integrated in service offerings.

Neustar highlighted its caller name (“CNAM”) service for TDM/wireline technologies, which authenticate display names with the calling party telephone number. This approach uses the development and integration of analytics to detect illegal robocall activity. Supplemented with other data, calls can be categorized and/or scored with useful information and then signaled to the subscriber over the CNAM infrastructure. The subscriber will see whether a number is suspect and can then decide whether to answer. What makes CNAM attractive is that it can be used immediately on any network or technology. While some technologies will work today on wireless networks, the CNAM solution can be immediately deployed on the millions of wireline/TDM telephones homes.

Neustar is not alone in offering such products. Verizon has already integrated CNAM into its Fios Digital Voice service to warn customers about calls identified by Verizon’s analytics engine and its robocall mitigation team.<sup>4</sup> Mobile providers are offering their own services. T-Mobile’s Scam ID is a network call data analysis and heuristics solution that identifies calls from known phone scammers, across all handset platforms, on smartphones and feature phones alike. If a scam call is detected, the Caller ID will display “Scam Likely” on the device, which gives customers the option to answer or permanently block the number. T-Mobile also offers Scam Block, which blocks calls from known scammers. First Orion, who helped develop T-Mobile’s offerings, recently explained its blocking mechanism

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<sup>4</sup> See Robocall Strike Force Report, at 18 (April 28, 2017), available at [http://www.atis.org/01\\_strat\\_init/Robocalling/docs/Ex%20Parte-Strike-Force-Report-2017-04-28-FINAL.PDF](http://www.atis.org/01_strat_init/Robocalling/docs/Ex%20Parte-Strike-Force-Report-2017-04-28-FINAL.PDF).



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and scoring system to the Commission, highlighting that these tools are already available to consumers.<sup>5</sup> Overall, these products have successfully reduced the number of robocalls plaguing consumers.

The Commission should do more to support these solutions in the forthcoming *Report and Order*. Doing so will encourage providers to implement these products into their offerings.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS. If you have any questions, please do not hesitate to contact me.

Very truly yours,

/s/ Thomas J. Navin

Thomas J. Navin  
*Counsel to Neustar, Inc.*

cc: Claude Aiken  
Amy Bender  
Travis Litman  
Zenji Nakazawa  
Nirali Patel

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<sup>5</sup> Making it Safe for Businesses to Call and Safe for Customers to Answer, *attached to* Letter from John Ayers, Vice President, Corporate Development, First Orion Corp., CG Docket No. 17-59 (filed Oct. 23, 2017).

# COMMERCIAL SOLUTIONS AVAILABLE NOW

- Leverage existing CNAM infrastructure to warn consumers of suspect calls
- Interconnected with over 800 operators; available today across landline, cable & VoIP phones
- Apply call pattern and behavior analysis to detect robocalling and suspicious activity.
- Allow verified owners to specify which phone numbers do not originate calls to create authoritative DNO blacklist

